ROBERT C. JAROSH, #6-3497 BILLIE LM ADDLEMAN, #6-3690 ERIN E. BERRY, #7-6063

Hirst Applegate, LLP P. O. Box 1083 Cheyenne, WY 82003-1083 Phone: (307) 632-0541

Fax: (307) 632-4999 rjarosh@hirstapplegate.com baddleman@hirstapplegate.com eberry@hirstapplegate.com

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

Gramercy Distressed Opportunity Fund II, L.P., Gramercy Distressed Opportunity Fund III, L.P., Gramercy Distressed Opportunity Fund III-A, L.P., Gramercy Funds Management LLC, Gramercy EM Credit Total Return Fund, and Roehampton Partners LLC,

Plaintiffs,

V.

Oleg Bakhmatyuk, Nicholas Piazza, SP Capital Management, LLC, Oleksandr Yaremenko, and TNA Corporate Solutions, LLC,

Defendants.

Civil Action No. 21-CV-223-F

NOTICE OF COMPLEXITY OF CIVIL CASE

Pursuant to U.S.D.C. Local Rule 16.4, Plaintiffs hereby notify the Court and opposing parties that the above named civil case is:

NON-COMPLEX

X COMPLEX

Dated: 7 December 2021.

HIRST APPLEGATE, LLP

LAW OFFICES
P.O. BOX 1083
CHEYENNE, WYOMING 82003-1083

Gramercy Distressed Opportunity Fund II, L.P., Gramercy Distressed Opportunity Fund III, L.P., Gramercy Distressed Opportunity Fund III-A, L.P., Gramercy Funds Management LLC, Gramercy EM Credit Total Return Fund, and Roehampton Partners LLC, Plaintiffs,

ROBERT C. JAROSH, #6-3497 BILLIE L.M. ADDLEMAN, #6-3690

ERIN E. BERRY, #7-6063

OF HIRST APPLEGATE, LLP

Attorneys for Plaintiffs

P. O. Box 1083

Cheyenne, WY 82003-1083

Phone: (307) 632-0541 Fax: (307) 632-4999

rjarosh@hirstapplegate.com

baddleman@hirstapplegate.com

eberry@hirstapplegate.com

-2-